

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of:	)	
	)	
Amendment of Sections 74.1203(a)(3) and	)	RM No. 11786
74.1204(f) of the Commission's Rules to	)	
Protect Local Radio Service Provided by	)	
Fill-In Area FM Translators	)	

To: The Commission

**COMMENTS  
OF  
STEVEN R. BARTHOLOMEW**

**I, Steven R. Bartholomew**, am submitting these Comments in the above-captioned Petition for Rulemaking pursuant to Public Notice Report No. 3074 which was released on April 18, 2017.

Aztec wants to limit the ability of a full-power primary station to remediate translator interference. Only translator interference that occurs within the F(50,50) 60-dBu contour of the full-power station would be subject to remediation.

Not infrequently, the F(50,50) 60-dBu contour of a full-powered primary station differs dramatically with respect to the actual real-world coverage. Moreover, these differences are too great to be resolved by a "protected zone plus buffer" approach where, for example, 6 dB is subtracted from the normal 60-dBu protected contour of a full-powered station to arrive at an "effective" protected contour (including buffer) of 54 dBu. With respect to the attached maps for full-power radio station KIQN (the former call letters were KJQY, but the facility is the same), note that the actual coverage (as corroborated by Longley-Rice) dramatically exceeds the F(50,50) contours in many directions (i.e, especially to the North). This is how the facility was designed to function, and is the original intent of the engineers. The engineers did not foresee subsequent problems with respect to translators wanting a full set of squatters rights along with quasi-primary status.

In the foregoing example, the population in the F(50,50) 60-dBu contour is 152,000. However, the population within the Longley-Rice 60-dBu contour is over 436,000. The Longley-Rice coverage is completely corroborated by actual measurements and listener testing. This is a tremendous population differential. If the Aztec Petition were to be accepted, KIQN would lose over half of its listeners. Even using a 60-dBu with a 6-dB buffer would have a substantially similar result. We would still lose more than half of our listeners.

For all of the above reasons, Aztec's Petition must be denied.

Best Regards,

Steven R. Bartholomew

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Submitted May 18, 2017

Longley-Rice Coverage Map - KJQY-FM 103.3

## 100,000 Watts, 542' Above Average Terrain

Transmitter Site: North Rattlesnake Butte

F50:50	Color	Total Population
70 dBu		10,700
60 dBu		152,840
54 dBu		175,546

Longley Rice	Color	Population
> 70 dBu		226,879
60 – 70 dBu		209,541
54 – 60 dBu		127,393
50 – 54 dBu		77,583
45 – 50 dBu		20,871